

County Sheriff Deputy. The response is dated on 12/18/2024. The request was “For each of the respondent's please send a copy of their signed (by the respondent) Oat[h] of Office for their position as Sauk County Sheriff Deputy, that was current for the dates of 4/6/2023 through 5/18/2023. The response:

[...] “Upon diligent search and reasonable inquiry the Defendants are not in possession of individual signed oaths for Deputy Alex Breunig, Deputy Steven Messner, Deputy Erik Knull and Deputy [D]aniel Krolkowski for the time period requested.
[...] (Exhibit A pg 4)

Speaking on this same issue, on 6/10/2024, Sauk County ADA Arevalo in court speaking of these same defendants stated, [...]

“I'm not sure based on information that I've gathered that Sauk County law enforcement officers sign a physical oath. I'm not sure if -- I know that they swear an oath, and I can certainly -- I'm sure they could provide the -- the language that is -- that each of them are sworn in with, but I'm not sure that each individual officer signs a particular document that contains an oath. (Exhibit B, Trans pg 16 ln. 21 through pg 17 ln 3.)

If these defendants do have a written oath of office it was incumbent upon them to locate and present them when requested. Rule 34 states that the responding party is to produce, for inspection, copying items in the responding party's possession, custody, or control the designated documents, in this case their Oaths of Office for Deputy Sheriff. Wis. Stat. 19.01(1m) allows for a spoken oath in addition to the written, but the written is absolutely required. An Open Record Request was made regarding the oaths of office for these deputies. Plaintiff has personally asked for them at the Sheriff's office and the County Clerks office for Oaths of Office. The only documentation that was ever given is the same as what the Defendants have given.(Exhibit A) The Deputy Defendants do not have possession or control of any signed Oaths to present to Plaintiff because they do not exist.